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Attorneys for Defendants Pangang Group

Company, Ltd., Pangang Group Steel

Vanadium & Titanium Company, Ltd.,

Pangang Group Titanium Industry Company,

Ltd., and Pangang Group International

Economic & Trading Company

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PANGANG GROUP COMPANY, LTD.;
PANGANG GROUP STEEL VANADIUM &
TITANIUM COMPANY, LTD.; PANGANG
GROUP TITANIUM INDUSTRY COMPANY,
LTD.; and PANGANG GROUP
INTERNATIONAL ECONOMIC & TRADING
COMPANY,

Defendants.

) CASE NO. 4:11-CR-0573-07-10 JSW

)
) **DECLARATION OF ZI CHUN WANG**
) **IN SUPPORT OF PANGANG**
) **DEFENDANTS' MOTION TO**
) **DISMISS INDICTMENT**

) Date: January 4, 2022

) Time: 9:30 a.m.

) Judge: Hon. Jeffrey S. White

) Courtroom: 5, 2nd Floor

DECLARATION OF ZI CHUN WANG

I, Zi Chun Wang, declare as follows:

1. I am a law clerk at Quinn Emanuel Urquhart & Sullivan LLP, and am working on a matter for Pangang Group Company, Ltd., Pangang Group Steel Vanadium & Titanium Company, Ltd., Pangang Group Titanium Industry Company, Ltd., and Pangang Group International Economic & Trading Company (collective, the “Defendants”).

2. I am able to speak, read, and write in Mandarin Chinese at the level of a native Mandarin speaker.

3. On several occasions in October and November 2021, I visited the website of the Chinese government’s National Enterprise Credit Information Publicity System (homepage available at <http://www.gsxt.gov.cn/index.html> (国家企业信用信息公示系统)). The vast majority of this website’s content is written in Mandarin Chinese.

4. **Exhibit A** is a screenshot of the homepage of the National Enterprise Credit Information Publicity System website, which I took on November 20, 2021. (An English translation is included with Exhibit A.) This screenshot states, in Mandarin at the bottom, that this website is organized by the Chinese government’s State Administration for Market Regulation (“SAMR”).¹

5. **Exhibit B** is a screenshot of the information page of the National Enterprise Credit Information Publicity System website (available at <http://www.gsxt.gov.cn/affiche-query-info-help.html>), which I took on November 20, 2021. (An English translation is included with Exhibit

¹ A report from the USDA’s Foreign Agricultural Service states that SAMR was created by China in 2018, when China consolidated the State Administration for Industry and Commerce and several other government agencies into SAMR. See FAS Staff, *China Announces Revamped Market Regulation Administration*, FAS.USDA.GOV, Oct. 19, 2018, available at <https://apps.fas.usda.gov/newgainapi/api/report/downloadreportbyfilename?filename=China%20Announces%20Revamped%20Market%20Regulation%20Administration%20Beijing%20-%20Peoples%20Republic%20of%2010-19-2018.pdf> (last visited Nov. 21, 2021).

1 B.) This screenshot states, in Mandarin at the top, that the information in the system is made
2 public according to the laws and regulations of the People's Republic of China.

3 6. In November 2021, I also reviewed English-language websites explaining that
4 China established the National Enterprise Credit Information Publicity System in 2014. *See What*
5 *is the National Enterprise Credit Information Publicity System in China?*, SINOINSPECTION.COM,
6 Dec. 17, 2020, available at [https://sinoinspection.com/national-enterprise-credit-information-](https://sinoinspection.com/national-enterprise-credit-information-publicity-system-china/)
7 [publicity-system-china/](https://sinoinspection.com/national-enterprise-credit-information-publicity-system-china/) (last visited Nov. 20, 2021); *see also*, Lining Shan, *China Launches*
8 *Nationwide Company Credit Information System*, OMM.COM, Nov. 4, 2014, available at
9 [https://www.omm.com/resources/alerts-and-publications/publications/china-launches-nationwide-](https://www.omm.com/resources/alerts-and-publications/publications/china-launches-nationwide-company-credit-informa?sc_lang=zh-CN)
10 [company-credit-informa?sc_lang=zh-CN](https://www.omm.com/resources/alerts-and-publications/publications/china-launches-nationwide-company-credit-informa?sc_lang=zh-CN) (last visited Nov. 20, 2021) (“China’s State
11 Administration of Industry and Commerce (‘SAIC’) has launched the National Company Credit
12 Information System, an online resource that provides free information about companies to the
13 public.... [T]he Shanghai High Court announced on July 23, 2014 that corporate registration
14 information obtained from th[is online] system may be used to establish the status of a corporate
15 entity for the purposes of filing a lawsuit before Shanghai courts, and may be used as evidence.”).

16 7. On November 21, 2021, I searched the National Enterprise Credit Information
17 Publicity System website for Pangang Group Company, Ltd. (“Pangang Group”). **Exhibit C** is a
18 screenshot showing the query results from my search. (An English translation is included with
19 Exhibit C.) This screenshot states, in Mandarin, that there was an “Equity Change” in the
20 ownership of Pangang Group on January 12, 2014. More specifically, the screenshot states that on
21 January 12, 2014, Ansteel Group Corporation Limited assumed ownership of 100% of Pangang
22 Group’s shares, and that prior to that ownership change, the State-Owned Assets Supervision and
23 Administration Commission of the State Council (“SASAC”) owned 100% of Pangang Group’s
24 shares.
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1 I declare under penalty of perjury under the laws of the United States of America that
2 foregoing is true and correct to the best of my knowledge, information, and belief.

3 Executed November 29, 2021, in Boston, Massachusetts.

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5 /s/ Zi Chun Wang
6 ZI CHUN WANG
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EXHIBIT A



国家企业信用信息公示系统

National Enterprise Credit Information Publicity System

▼ 企业信用信息

经营异常名录

严重违法失信企业名单



请输入企业名称、统一社会信用代码或注册号

查 询

热搜榜: 厦门仲夏之月文化传媒... 安徽国贾贸易有限责任... 北京嘉禾阳光建筑门窗...

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信息公告



企业信息填报



小微企业名录



重点领域企业

主办单位: 国家市场监督管理总局

地址: 北京市西城区三里河东路八号 邮政编码: 100820 备案号: 京ICP备18022388号-2 010-88650267

[业务咨询与技术支持联系方式](#) [使用帮助](#)

DECLARATION OF CERTIFIED COURT INTERPRETER

Marilyn Luong, MA

Master of Arts in Translation and Interpretation (Chinese/English)
1534 Plaza Lane #339
Burlingame, CA 94010

I, Marilyn Luong, declare that I am a court-certified interpreter in Mandarin and Cantonese Chinese by the Administrative Office of the Courts of California. My Certification Number is #301081. I also hold a Master's Degree in Translation and Interpretation (Chinese/English) from the Middlebury Institute of International Studies at Monterey, formerly known as the Monterey Institute of International Studies.

I certify that the following document is a true and correct translation from Chinese into English, to the best of my knowledge and abilities:

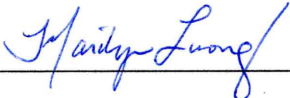
Exhibit – Home Page

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

This declaration signed this 28th day of November, 2021 in Burlingame, California.

Marilyn Luong

Printed Name of Certified Court Interpreter

A handwritten signature in blue ink, reading "Marilyn Luong", is written over a horizontal line.

Signature of Certified Court Interpreter

[Translation of Home Page]



National Enterprise Credit Information Publicity System

National Enterprise Credit Information Publicity System

▼ **Enterprise Credit Information** List of Business Abnormalities List of Enterprises with Serious Illegal and Dishonest Acts



Please enter enterprise name, unified social credit code, or registration number

Query

Hot search list: Xiamen Midsummer Moon Culture Media ... Anhui Guojia Trading Co. ... Beijing Jiahe Sunshine Building Doors and Windows ... [More](#)



Information & Announcement



Enterprise Information Filing



Micro and Small Enterprises List



Key Fields Enterprises

Organizer: State Administration for Market Regulation

Address: No. 8, Sanlihe East Road, Xicheng District, Beijing, Postal Code: 100820. Registration Number: Jing ICP Bei No. 18022388-2 010-88650267

[Business consultation and technical support contact information](#)

[User Help](#)

Brackets [] indicate translation note.

Italics denotes English in the original document.

EXHIBIT B



网站使用帮助

一、公示依据

本系统信息公示依据《中华人民共和国政府信息公开条例》、《企业信息公示暂行条例》等法律法规、规章的有关规定。

二、系统功能简介

本系统提供全国企业、农民专业合作社、个体工商户等市场主体信用信息的填报、公示、查询和异议等功能。

- 1、查询市场主体信用信息，输入名称或统一社会信用代码进行查询。系统支持按名称的关键词模糊查询，一次最多显示100条记录。对于无效的查询条件，将不会显示查询结果。地方特色公告需要到各省子网站的其他公告中查看。
- 2、市场主体填报年度报告、即时信息、简易注销申请和其他信息，通过本系统选择登记机关所在地区，点击“企业公示信息填报”进行填报。
- 3、自然人必须实名注册后才能使用个人中心相关功能。

三、信息说明

- 1、本系统公示的信息来自市场监督管理部门、其他政府部门及市场主体，政府部门和市场主体分别对其公示信息的真实性负责。
- 2、本系统使用过程中如有问题，可拨打市场主体所在省、自治区、直辖市企业信用信息公示系统主页下方的业务咨询电话或技术支持电话。
- 3、建议使用Chrome、IE等主流的高版本浏览器。

DECLARATION OF CERTIFIED COURT INTERPRETER

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I certify that the following document is a true and correct translation from Chinese into English, to the best of my knowledge and abilities:

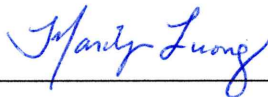
Exhibit – Information Page

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

This declaration signed this 28th day of November, 2021 in Burlingame, California.





Marilyn Luong

Printed Name of Certified Court Interpreter



Signature of Certified Court Interpreter

[Translation of Information Page]

 Home Page	 Enterprise Information Filing	 Information & Announcement	 Key Field Enterprises	Navigation	Log-in Registration
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National Enterprise Credit Information Publicity System

National Enterprise Credit Information Publicity System

User Help

Help Using This Website

I. Publicity Basis

The information in this system is made public according to the 《Regulations of the People's Republic of China on the Disclosure of Government Information》, 《The Interim Regulations on Enterprise Information Publicity》, and other laws, regulations and rules.

II. Overview of System Functions

This system provides the functions including filling in, making public, querying, and objecting to the credit information of market entities including enterprises, specialized farmers' cooperatives, individual industrial and commercial households, etc. nationwide.

1. To look up the credit information of a market entity, enter the name or unified social credit code. The system supports fuzzy keyword queries by name and can display up to 100 records at a time. Invalid query condition will not display query results. Specific local announcements are only available in other announcements on the provincial sub-websites.
2. For market entities, to file annual reports, instant information, simple cancellation applications, and other information, select the region where the registration authority is located through this system and click "Enterprise Publicity Information Filing".
3. For natural persons, a real-name registration is required to use the relevant functions of the personal center.

III. Information Notes

1. The information made public in this system comes from market supervision and management departments, other government departments, and market entities. Government departments and market entities are themselves responsible for the authenticity of their public information.
2. If you have any questions when using this system, you can call the business consultation or technical support helplines at the bottom of the homepage of the enterprise credit information publicity system of the province, autonomous region, or municipality where the market entity is located.
3. The latest version of mainstream browsers, such as Chrome, IE, etc, are recommended.

Brackets [] indicate translation note.

Italics denotes English in the original document.

EXHIBIT C

以下信息由该企业提供，企业对其报送信息的真实性、合法性负责

■ 股东及出资信息

股东	认缴额 (万元)	实缴额 (万元)	认缴明细				实缴明细			
			认缴出资方式	认缴出资金额 (万元)	认缴出资日期	公示日期	实缴出资方式	实缴出资金额(万 元)	实缴出资日期	公示日期
鞍钢集团有限 公司	500000	500000	货币	500000.0	2009年12 月17日	2021年10 月8日	货币	500000.0	2009年12 月17日	2021年10 月8日

共 查询到 1 条记录 共 1 页

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■ 股权变更信息

序号	股东	变更前股权比例	变更后股权比例	股权变更日期	公示日期
1	鞍钢集团公司	0%	100%	2014年1月12日	2021年10月19日
2	国务院国有资产监督管理委员会	100%	0%	2014年1月12日	2021年10月18日

共 查询到 2 条记录 共 1 页

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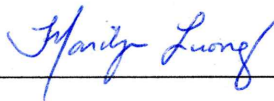
Exhibit – Equity Change

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

This declaration signed this 28th day of November, 2021 in Burlingame, California.

Marilyn Luong

Printed Name of Certified Court Interpreter

A handwritten signature in blue ink, appearing to read "Marilyn Luong", is written over a horizontal line.

Signature of Certified Court Interpreter

[Translation of Equity Change]

The following information is provided by the company below; the company is responsible for the authenticity and legality of the reported information

Information of Shareholders and Capital Contribution

Shareholder	Subscribed Amount (in 10,000 yuan)	Paid-in Amount (in 10,000 yuan)	Subscription Details				Paid-in Contribution Details			
			Mode of Subscribed Capital Contribution	Amount of Subscribed Capital Contribution (in 10,000 yuan)	Date of Subscribed Capital Contribution	Announcement Date	Mode of Paid-in Capital Contribution	Amount of Paid-in Capital Contribution (in 10,000 yuan)	Date of Paid-in Capital Contribution	Announcement Date
Ansteel Group Corporation Limited	500,000	500,000	In currency	500,000.0	December 17, 2009	October 8, 2021	In currency	500,000.0	December 17, 2009	October 8, 2021

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Objection



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Information of Equity Change

No.	Shareholder	Shareholding Ratio before Change	Shareholding Ratio after Change	Date of Equity Change	Announcement Date
1	Ansteel Group Corporation [Limited]	0%	100%	January 12, 2014	October 19, 2021
2	State-owned Assets Supervision and Administration Commission of the State Council	100%	0%	January 12, 2014	October 18, 2021

2 results found

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